UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

HUMAN RIGHTS WATCH,

Plaintiff,

V.

No. 13. Civ. 7360

DEPARTMENT OF JUSTICE FEDERAL BUREAU OF PRISONS.

Defendant.

NOTICE OF MOTION FOR ATTORNEYS' FEES AND COSTS

PLEASE TAKE NOTICE that upon the annexed memorandum of law; supporting declaration of Jonathan Manes and the exhibits appended thereto; and all prior pleading and proceedings herein, plaintiff Human Rights Watch, by its undersigned counsel, hereby moves this Court for an award of attorney's fees and costs in the amount of \$130,418.00 pursuant to the Freedom of Information Act, 5 U.S.C. § 552(a)(4)(E), and Rule 54(d) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

> David A. Schulz, *supervising attorney* MEDIA FREEDOM AND INFORMATION ACCESS CLINIC **ABRAMS INSTITUTE** YALE LAW SCHOOL P.O. Box 208215 New Haven, CT 06520-8215 Tel: (212) 850-6100 Fax: (203) 432-3034

david.schulz@yale.edu

Dated: New Haven, CT July 7, 2016

Counsel for Human Rights Watch